

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

PINNACLE PACKAGING COMPANY, )  
INC., an Oklahoma corporation, )  
POLO ROAD LEASING, LLC, an Okla- )  
homa limited liability company, and )  
J. SCOTT DICKMAN, )

Plaintiffs, )

vs. )

Case No. 12-CV-537-JED-TLW

CONSTANTIA FLEXIBLES GmbH, an )  
Austrian corporation, and )  
ONE EQUITY PARTNERS (EUROPE) GmbH, )

Defendants. )

**UNOPPOSED MOTIONS FOR ENLARGEMENT OF TIME TO FILE  
REPLY BRIEF AND FOR ADDITIONAL TWO PAGES ON REPLY**

The Plaintiffs, Pinnacle Packaging Company, Inc., Polo Road Leasing, LLC, and J. Scott Dickman (collectively “Plaintiffs”), hereby move the Court for an enlargement of time to file their reply to the response of Defendants on the *Motion of Plaintiffs to Apply Crime Fraud Exception to Claims of Privilege by Defendants and for Other Relief on Claims of Privilege* from the date established by the Court of September 18, 2015 [DKT 141], to September 21, 2015, and to grant Plaintiffs the right to file an additional two pages on their reply brief, making the reply a total of 12 pages. In support of this Motion, Plaintiffs show the Court:

1. The Defendants do not oppose the relief sought in this motion.
2. Because of an intervening holiday, and the press of other business, Plaintiffs cannot fully complete their reply within the time allowed, and extending the time for filing over the requested weekend should not impede the Court’s consideration of the issue.

3. The additional two pages are requested because of the complexity of the factual scenario developed through the initial two briefs, and added to that is a necessity to clarify the proper legal framework for the determination of the issue.

WHEREFORE, Plaintiffs respectfully request that their unopposed Motions be granted and that they be given other just and appropriate relief.

s/Laurence L. Pinkerton

Laurence L. Pinkerton, OBA #7168

Pinkerton Law, P.C.

Penthouse Suite

15 East 5th Street

Tulsa, Oklahoma 74103-4303

918-587-1800

918-582-2900 - fax

pf@att.net

Attorney for Plaintiffs

### **CERTIFICATE OF SERVICE**

I hereby certify that on September 11th, 2015, I electronically transmitted the foregoing pleading, to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

John D. Russell, Esq.  
GABLEGOTWALS  
1100 ONEOK Plaza  
100 West Fifth Street  
Tulsa, Oklahoma 74103-4217

Cheryl Howard, Esq.  
Gabrielle Gould, Esq.  
Aaron Lang, Esq.  
Marshall Fishman, Esq.  
FRESHFIELDS BRUCKHAUS DERINGER US LLP  
601 Lexington Ave., 31st Floor  
New York, NY 10022

/s/ Laurence L. Pinkerton